

ANDREW J. COSTIGAN Partner

Freeborn & Peters LLP Attorneys at Law The Helmstey Building 230 Park Avenue, Suite 630 New York, NY 10169

(212) 218-8765 direct (212) 218-8761 fax

acostigan@freeborn.com

www.freeborn.com

May 1, 2019

VIA ECF AND FACSIMILE (212) 805-7986

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re:

Wesco Insurance Company and Technology Insurance Company, Inc. v. Personnel Staffing Group, LLC; Civil Action No.: 18-civ-03771 (PGG) Joint Status Letter Regarding Settlement and Case Management Plan

Dear Judge Gardephe:

In accordance with the Court's April 4, 2019 Order, the parties submit this joint status letter.

This action was brought by Wesco Insurance Company and Technology Insurance Company, Inc. asserting claims for breach of contract by Personnel Staffing Group, LLC for its alleged failure to permit an audit and to pay final premium due on two workers' compensation and employers' liability insurance policies.

Following the parties' April 1, 2019 joint letter to the Court, the parties have been involved in settlement discussions and remain in negotiations and hopeful that they can resolve the dispute. We respectfully request that the stay be extended five weeks, until June 5, 2019 to give the parties additional time to reach a settlement.

We thank the Court for its consideration, and we are available at the Court's convenience to address any questions or concerns.



The Honorable Paul G. Gardephe May 1, 2019 Page 2

Andrew J. Costigan

Daniel Hargraves

FREEBORN & PETERS LLP

The Helmsley Building

230 Park Avenue, Suite 630 New York, New York 10169

212-218-8760

acostigan@freeborn.com

dhargraves@freeborn.com

Paul D. Sarkozi

Alexandra Kamenetsky Shea

TANNENBAUM HELPERN SYRACUSE &

HIRSCHTRITT LLP

900 Third Avenue

New York, New York 10022

212-508-6700

sarkozi@thsh.com

shea@thsh.com

Counsel for Plaintiffs Wesco Insurance Company and Technology Insurance Company, Inc. Counsel for Defendant Personnel Staffing Group, LLC

cc:

Nathan A. Shev, Esq. (Sperling & Slater, P.C.)

Fax: (312) 641-6492